

REMARKS

By this amendment, claims 1-15, 17, 21-23, 27-30, 32-36, 40, and 41 are pending. No new matter is introduced.

The final Office Action mailed February 9, 2007 rejected claims 1-4, 7-26, 35, and 36¹ as obvious under 35 U.S.C. § 103 based on *Liljestrand et al.* (US 6,853,714) in view of *Bednarek et al.* (US 6,965,868), claims 5 and 6 as obvious under 35 U.S.C. § 103 based on *Liljestrand et al.* (US 6,853,714) in view of *Bednarek et al.* (US 6,965,868) and in further view of *Guidice et al.* (US 6,463,420), claims 27-30, and 32-34 as obvious under 35 U.S.C. § 103 based on *Liljestrand et al.* (US 6,853,714) in view of *Bednarek et al.* (US 6,965,868) and in further view of *Sridhar et al.* (US 6,098,108), and claims 40 and 41 as obvious under 35 U.S.C. § 103 based on *Liljestrand et al.* (US 6,853,714) in view of *Bansal* (US 6,788,949).

Applicants respectfully traverse the several rejections, as the applied references, alone or in combination, fail to disclose or make obvious all the claimed features.

Although the Examiner relies on *Liljestrand et al.* for a teaching of “receiving a procurement inquiry from a customer application,” “generating procurement data in response to the procurement inquiry,” and “transmitting the procurement data to the customer application,” as in claim 1, Applicants assert that *Liljestrand et al.* does not teach these claimed features.

The Examiner relies on generalities about what is taught by *Liljestrand et al.* In particular, the Examiner refers to the “enhanced services platform” of *Liljestrand et al.* which utilizes a voice-activated, and possibly a web-activated, user interface to allow access to enhanced telecommunication services by a subscriber; connecting to the platform with a “virtual administrator” associated with the voice-activated interface within the enhanced services

¹ The Examiner must have intended claims 1-4, 7-15, 17, 21-23, 35, and 36, since claims 16, 18-20, and 24-26 have been canceled.

platform; routing callers and subscribers calling the system to the voice-activated interface for sign on and for providing state and status information to the voice-activated interface upon connection; and acknowledging the information and requesting additional information by the virtual administrator (see page 11 of the Office Action of February 9, 2007). Without ever specifying what the Examiner considers to be a one-to-one correspondence of the cited portions of *Liljestrand et al.* with the claimed steps, the Examiner merely states that all of the above cited elements of *Liljestrand et al.* “are considered ‘receiving a procurement inquiry from a customer application, generating procurement data in response to the procurement inquiry, and transmitting the procurement data to the customer application’” (page 11 of the Office Action of February 9, 2007). With all due respect, the Examiner may not cite a litany of elements from a cited reference, and with no further explanation as to how these elements are interpreted to encompass the claimed features, merely “consider” these elements to teach the claimed features.

It is not clear from the examiner’s rationale just what, in *Liljestrand et al.*, is interpreted as the claimed “customer application,” “receiving a procurement inquiry from a customer application,” “generating procurement data in response to the procurement inquiry,” and “transmitting the procurement data to the customer application.”

Applicants do not deny that *Liljestrand et al.* describes a capability to receive a voice command from a subscriber to access an enhanced telecommunications service or that the system of *Liljestrand et al.* permits the subscriber to connect to an enhanced local exchange (ELE) using a computer. Applicants also do not deny that *Liljestrand et al.* provides for the provisioning of services performed through a Network Operations Center 115. But, it is clear from col. 21, line 67 – col. 22, line 7, that the enhanced network 125 is accessed after provisioning since the subscriber profiles and enhanced services have clearly been configured. Therefore, it has not been shown by the Examiner that *Liljestrand et al.* describes “receiving a procurement inquiry

from a customer application,” “generating procurement data in response to the procurement inquiry,” and “transmitting the procurement data to the customer application.” The Examiner has not specifically pointed out what, in *Liljestrand et al.*, is considered to be the claimed “customer application,” what is then received from this customer application that is considered to be the claimed “procurement inquiry,” how such “procurement inquiry” causes a generation of the procurement data, and how such procurement data is then transmitted to the customer application. As such, the Examiner has not established a *prima facie* case of obviousness with regard to the instant claimed subject matter.

Since each of the instant claims has the same or similar claim features regarding “receiving a procurement inquiry from a customer application,” “generating procurement data in response to the procurement inquiry,” and “transmitting the procurement data to the customer application,” and none of the other applied references to *Bednarek et al.*, *Guidice et al.*, *Sridhar et al.*, and *Bansal* provides for the deficiencies of *Liljestrand et al.* in this regard, Applicants contend that there is no *prima facie* case of obviousness established against any one of the instant claims. Accordingly, withdrawal of the rejection of claims 1-15, 17, 21-23, 27-30, 32-36, 40, and 41 under 35 U.S.C. § 103 is respectfully requested.

Therefore, the present application, as amended, overcomes the rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at (703) 519-9952 so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

DITTHAVONG MORI & STEINER, P.C.

4/9/01
Date



Phouphanomketh Ditthavong
Attorney/Agent for Applicant(s)
Reg. No. 44658

918 Prince Street
Alexandria, VA 22314
Tel. (703) 519-9952
Fax. (703) 519-9958